

From: "Eron Dodak" <edodak@integral-corp.com>
To: "Novak, Madi" <Novak.Elisabeth@epa.gov>
CC: "Peterson, Lance" <peterstone@cdmsmith.com>
"Michael PINTO" <michael.pinto@totalenergies.com>
Date: 7/19/2021 2:52:59 PM
Subject: RE: Arkema Riverbank Soil Sampling FCRs and HASP Addendum 1
Attachments: [ATT00001.txt](#)
[FCR-02_RB Soil Sample Collection Methods_2021-07-19.pdf](#)

Hi Madi,

Attached is a revised version of FCR-02 that addresses the potential leaching of chlorobenzene. We also provided a few additional edits/clarifications to the FCR, including adding a sentence to the end of the text regarding the use of hand tools to relocate debris and rocks at the sample location.

Please let me know if you have any questions. Thanks!

ERON DODAK

Tel: 503.943.3614 | Cell: (b) (6)

INTEGRAL CONSULTING INC.

From: Novak, Madi <Novak.Elisabeth@epa.gov>
Sent: Saturday, July 17, 2021 7:32 AM
To: Eron Dodak <edodak@integral-corp.com>
Cc: Peterson, Lance <peterstone@cdmsmith.com>; 'Michael PINTO' <michael.pinto@totalenergies.com>
Subject: FW: Arkema Riverbank Soil Sampling FCRs and HASP Addendum 1

Hello Eron,

EPA approves the HASP Addendum and FCR-03.

With regard to FCR-02, EPA has some concerns with potential leaching of VOCs when "...some deionized or distilled water will be added to the core barrel. . .". I understand from communications that you intend to add only the volume of water needed to saturate the upper 6 inches or so of the soil in the liner to create the necessary suction, thereby limiting any potential leaching. Would you please revise the FCR to elaborate on how the potential to leach volatile chemicals (e.g. chlorobenzene) from the soil through the addition of deionized or distilled water will be mitigated?

Thank you,
Madi

From: Eron Dodak <edodak@integral-corp.com>
Sent: Thursday, July 15, 2021 8:06 PM
To: Novak, Madi <Novak.Elisabeth@epa.gov>
Cc: Michael PINTO <michael.pinto@totalenergies.com>; Peterson, Lance <peterstone@cdmsmith.com>
Subject: Arkema Riverbank Soil Sampling FCRs and HASP Addendum 1

Hi Madi,

Per our discussion on July 8, attached are the following for your review:

- Field Change Request Form FCR-2: Riverbank Soil Sample Collection Methods
- Field Change Request Form FCR-3: Shift Riverbank Borings to 3 ft Landward of Top of Bank

- Site-Specific Health and Safety Plan Addendum 1: Provides modifications to the site-specific Health and Safety Plan to address respirator use, heat stress, and COVID-19 protocols.

Please let me or Mike Pinto know if you have any questions. Thanks!

ERON DODAK | Senior Consultant

Tel: 503.943.3614 | Cell: (b) (6)

319 SW Washington Street, Suite 1150 | Portland | OR 97204

edodak@integral-corp.com | www.integral-corp.com